

MEMORANDUM ENDORSED



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June 9, 2021

BY ECF

Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Willie James Baines v. City of New York, et al.
20 CV 6282 (GHW)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney for defendants City of New York and Robert Gaylog in the above-referenced matter. Defendants write to respectfully request an adjournment of the June 16, 2021 Initial Pretrial Conference to a date convenient for the Court after June 29, 2021. To the extent the Court is inclined to grant the within request, defendants further request a corresponding extension of time for the parties to submit the joint letter and proposed case management plan to one week before the new date for the Initial Pretrial Conference. This is the first request of this kind, co-defendant Roosevelt Monestime's counsel, Douglas LaBarbera, consents to this request and the undersigned has not been able to reach plaintiff's counsel, Alexander Roytblat, for his position in regards to this request.

The reason for this request is, this past weekend, the Law Department's network, file system, and email system was disabled and became completely inaccessible to the undersigned. To date, the undersigned is still unable to access any information on the Law Department's network, file and email system. Due to this outage, the undersigned has been unable to access the files related to this case, and has therefore been unable productively and informatively confer with Mr. Roytblat and Mr. LaBarbera pursuant to Fed. R. Civ. P. 26(f) or prepare the joint letter and proposed case management plan in advance of the Initial Pretrial Conference currently scheduled for June 16, 2021 at 4:30 p.m.

At this time, it is unknown when the undersigned will have access to the system again and accordingly, defendants respectfully request an adjournment of the June 16, 2021 conference to a date and time convenient for the Court after June 29, 2021¹, and a corresponding extension of time for the parties to submit the joint letter and proposed case management plan.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Inna Shapovalova

Inna Shapovalova
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
Alexander Roytblat, Esq.
Attorney for plaintiff

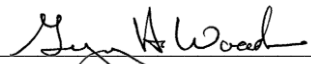
Douglas LaBarbera, Esq.
Attorney for defendant Roosevelt Monestime

Application granted. The conference scheduled for June 16, 2021 is adjourned to July 9, 2021 at 1:00 p.m. The conference will take place by phone. The parties are directed to the Court's Emergency Rules in Light of COVID-19, which are available on the Court's website, for the dial-in number and other relevant instructions. The parties are specifically directed to comply with Rule 2(C) of the Court's Emergency Rules. The joint letter and proposed case management plan described in the Court's May 28, 2021 order, Dkt. No. 38, are due no later than July 2, 2021.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 39.

SO ORDERED.

Dated: June 9, 2021
New York, New York



GREGORY H. WOODS
United States District Judge

¹ The undersigned is scheduled to be out of the office, on vacation, from June 21, 2021 to June 28, 2021, and therefore respectfully requests that the conference be rescheduled to a date sometime after June 29, 2021.